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8 UNITED STATES DISTRICT COURT  
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10 MARK SNOOKAL, an individual,

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12 Plaintiff,

13 vs.  
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15 CHEVRON USA, INC., a California  
16 Corporation, and DOES 1 through 10,  
17 inclusive,

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19 Defendants.  
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) CASE NO.: 2:23-cv-6302-HDV-AJR

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)  
) **[PROPOSED] ORDER GRANTING**  
) **PLAINTIFF MARK SNOOKAL'S *EX***  
) ***PARTE* APPLICATION FOR LEAVE TO**  
) **FILE A MOTION TO COMPEL**  
) **FURTHER DISCOVERY AND TO FILE A**  
) **MOTION FOR SANCTIONS AGAINST**  
) **DEFENDANT AND ITS COUNSEL**

)  
) District Judge: Hon. Hernan D. Vera  
) Magistrate Judge: Hon. A. Joel Richlin  
) Action Filed: August 3, 2023  
) Trial Date: August 19, 2025  
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1 Before the Court is Plaintiff's *Ex Parte* Application for Leave to File a Motion to  
2 Compel Further Discovery and to File a Motion for Sanctions against Defendant and Its  
3 Counsel. Plaintiff argues in the main that good cause exists for *ex parte* relief given Defendant's  
4 discovery abuse, including but not limited to Defendant's repeated, inexcusable delay in  
5 producing probative documents; Defendant's repeated, inexcusable delay in providing its  
6 availability for an informal discovery conference; its failure to produce supplemental discovery  
7 responses despite its promises to do so; and its failure to make its witness, Dr. Victor Adeyeye,  
8 available to finish his deposition despite its promises to do so.

9 The Court agrees. Based upon the Declaration of Olivia Flechsig and Exhibits thereto  
10 submitted in support of Plaintiff's *Ex Parte* Application, it is evident that Defendant and its  
11 counsel did engage in the discovery misconduct described herein, and otherwise intentionally  
12 delayed. This prejudiced Plaintiff's ability to move the Court to compel further discovery and to  
13 move for sanctions against Defendant and its counsel, despite Plaintiff's attempts to timely  
14 obtain discovery and meet and confer with Defendant regarding same.

15 The Court hereby grants Plaintiff's *Ex Parte* Application in whole, and Plaintiff may file  
16 a Motion to Compel Further Discovery and Motion for Discovery Sanctions by [DATE]. The  
17 deadlines set by the Court's existing scheduling order (Dkt 38) otherwise stand.

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19 **IT IS SO ORDERED.**

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21 DATED: \_\_\_\_\_

22 \_\_\_\_\_  
23 Honorable Hernan D. Vera  
24 United States District Court Judge  
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